

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. No. 270, 510, 533

**THIRD SUPPLEMENTAL DECLARATION OF ANDREW G. DIETDERICH
IN SUPPORT OF DEBTORS' APPLICATION FOR AN ORDER
AUTHORIZING THE RETENTION AND EMPLOYMENT OF
SULLIVAN & CROMWELL LLP AS COUNSEL TO THE DEBTORS AND
DEBTORS-IN-POSSESSION NUNC PRO TUNC TO THE PETITION DATE**

I, Andrew G. Dietderich, under penalty of perjury, declare as follows:

1. I am admitted to practice law in the State of New York and the Southern District of New York. I am a partner in the law firm of Sullivan & Cromwell LLP ("S&C" or the "Firm"), which maintains an office at 125 Broad Street, New York, NY 10004-2498. On December 21, 2022, I submitted a declaration in support of the *Debtors' Application for an Order Authorizing the Retention and Employment of Sullivan & Cromwell LLP as Counsel to the Debtors and Debtors-in-Possession Nunc Pro Tunc to the Petition Date* [D. I. 270] (the "Application") and attached thereto was my declaration of support of the Application (the "Original Declaration").² On January 17, 2023, I submitted a supplemental declaration in support of the Application [D.I. 510] (the "First Supplemental Declaration"). On January 19,

¹ The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Application or the Original Declaration, as applicable.

2023, I submitted a second supplemental declaration in support of the Application [D.I. 533] (the “Second Supplemental Declaration” and together with the Original Declaration and First Supplemental Declaration, the “Prior Declarations”). I submit this third supplemental declaration (this “Third Supplemental Declaration”) in further support of the Application. Unless otherwise stated in this Third Supplemental Declaration, I have personal knowledge of the facts set forth herein.

2. In connection with its retention by the Debtors in this case, S&C has been provided with the list of entities identified on Schedule 1 attached hereto (the “Updated Interested Parties List”), which entities we understand to be parties involved in the Debtors’ chapter 11 cases who are not identified on Schedule 1 to the Original Declaration. The Updated Interested Parties List together with the parties identified on Schedule 1 to the Original Declaration are hereinafter referred to as the “Potential Parties in Interest”.

3. Based on S&C’s customary procedures with respect to potential conflicts described in the Original Declaration, a list of entities S&C currently represents with respect to the Updated Interested Parties List (“Updated Current Clients”) are identified on Schedule 2 attached hereto and a list of clients that are not Updated Current Clients but that S&C has represented since January 1, 2019 (“Updated Former Clients”) are identified on Schedule 3 attached hereto.

4. Based solely on the conflicts procedures described in the Original Declaration, to the best of my knowledge, except as set forth herein or in the Prior Declarations, S&C does not have an active relationship with any Potential Parties in Interest in matters relating to the Debtors’ chapter 11 cases.

5. Additionally, in connection with the Debtors' sale of the Anthropic Shares, S&C has identified one potential purchaser of the Anthropic Shares who is a current client of S&C. S&C does not have any active relationship with this potential purchaser in matters relating to the Debtors' chapter 11 cases.

6. To the extent any information disclosed herein requires amendment or modification upon S&C's completion of further review or as additional party in interest information becomes available to it, a further supplemental declaration reflecting such amended or modified information will be submitted to the Court.

7. I am authorized to submit this Third Supplemental Declaration on behalf of S&C, and if called upon to testify, I would testify competently to the facts set forth herein.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 29, 2024
New York, New York

/s/ Andrew G. Dietderich
Andrew G. Dietderich
Sullivan & Cromwell LLP